

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION	No. 2:12-md-02323-AB MDL No. 2323
Kevin Turner and Shawn Wooden, <i>on behalf of themselves and others similarly situated,</i> Plaintiffs, v. National Football League and NFL Properties, LLC, successor-in-interest to NFL Properties, Inc., Defendants.	Civ. Action No.: 14-cv-00029-AB
THIS DOCUMENT RELATES TO: ALL ACTIONS	

STIPULATION AND [PROPOSED] ORDER¹

This Stipulation and Agreement, dated July [31st], 2017, is made and entered into by and among the National Football League and NFL Properties LLC (the "NFL Parties"), and Class Counsel (collectively, the "Parties").

WHEREAS, on April 22, 2015, this Court issued a Memorandum (ECF No. 6509) and Final Order and Judgment (ECF No. 6510), and on May 8, 2015, an amended Final Order and Judgment (ECF No. 6534), approving the Settlement Agreement in its entirety;

¹ Unless otherwise noted, the terms used in this Order that are defined in the Settlement Agreement have the same meanings in this Order as in the Settlement Agreement.


WHEREAS, on May 4, 2015, Claims Administrator BrownGreer PLC, in accordance with the Final Order and Judgment and the Settlement Agreement, filed the list of Opt Outs who timely submitted proper requests to opt out in compliance with Section 14.2(a) of the Settlement Agreement, including Retired NFL Football Players Cody Douglas, Robert Douglass, Bradley Edelman, Paul Flatley, Bernard Kosar and Joseph Senser (ECF No. 6533);

WHEREAS, Cody Douglas, Robert Douglass, Bradley Edelman, Paul Flatley, Bernard Kosar and Joseph Senser have since submitted written requests seeking to revoke their Opt Out requests (*see* Exhibit 1 (Declaration of Orran L. Brown, Sr.));

WHEREAS, the Parties have agreed to accept the revocation requests submitted by Cody Douglas, Robert Douglass, Bradley Edelman, Paul Flatley, Bernard Kosar and Joseph Senser, subject to Court approval, because they submitted the requests before the deadline to register for the Class Action Settlement program;

AND NOW, this ~~31st~~ day of July, 2017, it is hereby stipulated and agreed by the Parties that the revocation requests submitted by Cody Douglas, Robert Douglass, Bradley Edelman, Paul Flatley, Bernard Kosar and Joseph Senser are accepted, subject to Court approval, because they submitted the requests before the deadline to register for the Class Action Settlement program.


It is so **STIPULATED AND AGREED**,

By: 

Date: July 31, 2017

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Class Counsel

By: Brad S. Karp  (DB)

Date: July 31, 2017

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It is so **ORDERED**, based on the above Stipulation and the accompanying Declaration of Orran L. Brown, Sr., that the revocation requests submitted by Cody Douglas, Robert Douglass, Bradley Edelman, Paul Flatley, Bernard Kosar and Joseph Senser are approved and the Claims Administrator is **DIRECTED** to post a revised list of Opt Outs forthwith excluding Cody Douglas, Robert Douglass, Bradley Edelman, Paul Flatley, Bernard Kosar and Joseph Senser.

ANITA B. BRODY, J.

Copies **VIA ECF** on _____ to:

Copies **MAILED** on _____ to: